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February 22, 2018

VIA ECF

Hon. Judge Claire R. Kelly
U.S. Court of International Trade
One Federal Plaza
New York, New York 10278-0001

Re: Claude Lewis v. American Sugar Refining, Inc., et. al.
Civil Action No.: 14-cv-02302

Dear Your Honor:

Please be advised, the undersigned is counsel to Plaintiff Claude Lewis (“Plaintiff”) in the above-captioned matter. I write to respectfully request a two-week extension of time to file Plaintiff’s opposition to Defendants’ Motion in Limine, which deadline is currently set for February 26, 2018, and a parallel two-week adjournment of the current March 12, 2018 final pre-trial conference. This is Plaintiff’s first request to extend the deadline by which to file opposition to Defendants’ motion in limine. As explained in more detail below, Defendants’ counsel does **not** consent to this request.

As Your Honor may be aware, and as Defendants’ counsel already knows, the undersigned and co-counsel for Plaintiff Nathaniel Charny and Gabrielle Vinci, are also plaintiff’s counsel in a separate matter against Defendant American Sugar, Mayo-Coleman v. American Sugar Holdings, Inc., Civil Action No.: 14-cv-0079. The undersigned, along with co-counsel, have been preparing for trial in the Mayo-Coleman matter, which is set to commence on February 26, 2018 and is anticipated to last approximately four (4) days. Although counsel anticipated being able to simultaneously prepare for trial and address Defendants’ motion in limine, unfortunately, counsel requires additional time to confer with Plaintiff and perfect Plaintiff’s opposition papers.



ATTORNEYS AT LAW

In light of the foregoing, Plaintiff respectfully asks that the remaining pre-trial deadlines be extended by two weeks and proposes the following schedule:

March 12, 2018 Deadline to file opposition to the parties' respective motions in limine

March 26, 2018 Final Pre-trial conference

As noted above, Defendants do **not** consent to the requested two-week extension. Defendants' counsel did represent, however, that Defendants would consent to extending the time to file opposition to the pending motions in limine from February 26, 2018 to March 5, 2018. The undersigned respectfully requests that if the court permits an extension of time to file opposition but denies adjourning the current March 12, 2018 final pre-trial conference, that counsel be allowed until March 7, 2018 to file their respective opposition papers.

Counsel remains available should Your Honor have any questions or concerns. Thank you.

Respectfully submitted,
NESENOFF & MILTENBERG LLP

By: /s/ Megan Goddard
Megan Goddard, Esq.

CC: All counsel (VIA ECF)